

EXHIBIT 1

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

LEONARD LICHT, ZHENGJUN CAI,
HENRY CHEN, DANIEL CHANG,
DOMINIC CHOW, CHENGGUO DONG,
IHAB W. FRANCIS, JOHN GORDON,
DALTON GREEN, MICHAEL GRILLI,
IRAKLIS KARABASSIS, NADER
LOBANDI, JAMES MOSKWA, ANH
NGUYEN, BRIAN ROTHaus,
GORDON SHAYLOR, RICHARD
SLAVANT, NATHANIAL THRAILKILL,
JACK YAO, and JUN ZHAI,

No. 1:24-cv-10447-NMG

Plaintiffs,

v.

BINANCE HOLDINGS LIMITED, d/b/a
BINANCE.COM, BAM TRADING
SERVICES, INC., d/b/a BINANCE.US, and
CHANGPENG ZHAO,

Defendants.

**STIPULATION REGARDING
DEFENDANTS' MOTION TO DISMISS THE SECOND AMENDED COMPLAINT**

Plaintiffs and Defendants (a “Party” or the “Parties”) enter this stipulation (“Stipulation”) setting a briefing schedule for Defendants’ forthcoming motion to dismiss the Second Amended Complaint (“SAC”) and enlarging the page limit for Defendants’ motion to dismiss. The Parties state as follows:

1. On February 19, 2025, Plaintiffs filed a Motion for Leave to File a Second Amended Complaint (“Motion for Leave to Amend”). *See* Dkt. No. 75.
2. On February 26, 2025, the Court granted Plaintiffs’ Motion for Leave to Amend. *See* Dkt. No. 78.

3. On February 26, 2025, Plaintiffs filed the SAC. *See* Dkt. No. 79.
4. The current deadline for Defendants to respond to the SAC is March 12, 2025. *See* Fed. R. Civ. P. 15(a)(3).
5. Defendants intend to jointly move to dismiss the SAC.
6. Previously, on May 1, 2024, Plaintiffs filed the First Amended Complaint (“FAC”). *See* Dkt. No. 36. On June 7, 2024, the Court entered an order setting a briefing schedule for Defendants’ joint motion to dismiss the FAC and setting the following page limits: 35 pages for each Defendants’ memorandum of law in support of the motion to dismiss and Plaintiffs’ opposition, and 20 pages for Defendants’ reply. *See* Dkt. No. 50.
7. On February 27 and 28, 2025, the Parties’ counsel conferred regarding a Defendants’ forthcoming motion to dismiss the SAC and agreed to the following briefing schedule:

Date	Event
March 28, 2025	Defendants’ deadline to move to dismiss the SAC
April 18, 2025	Plaintiffs’ deadline to file an opposition to Defendants’ motion to dismiss
May 9, 2025	Defendants’ deadline to file a reply in support of the motion to dismiss

8. Defendants hereby request the same page limitations as the Court ordered in connection with the Defendants’ motion to dismiss the FAC. *See* Dkt. No. 50; *see also* ¶ 6 above. Specifically, Defendants request:

- a. an enlargement of page limit for the memorandum of law in support of their motion to dismiss to 35 pages, and
- b. leave to file a reply brief of no more than 20 pages.

9. Plaintiffs take no position on Defendants’ request to enlarge the page limit for the memorandum of law in support of their motion to dismiss.

10. At this time, Plaintiffs are not seeking an enlargement of the page limit for their opposition to Defendants' motion to dismiss the SAC. Plaintiffs reserve the right to move to enlarge the page limit for their opposition.

Dated: March 5, 2025

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